

HARRY J. GIACOMETTI (HG2368)
FLASTER/GREENBERG P.C.
1810 Chapel Avenue West
Cherry Hill, NJ 08002-4609
(856) 661-1900
Attorneys for Kenneth and Randi Friedman

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re:

EDWARD J. HOVATTER and KIMBERLY
MACALUSO HOVATTER,

Debtors.

Honorable Andrew B. Altenburg Jr.

Chapter 11

Case No. 19-31483-ABA

**RESPONSE OF KENNETH FRIEDMAN
AND RANDI FRIEDMAN TO DEBTORS'
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY (Docket No. 40)**

Hearing Date: March 3, 2020

Hearing Time: 10:00 am.

Kenneth and Randi Friedman (the "Friedmans"), by and through their undersigned attorneys, hereby respond to the Debtors' Motion for Relief from the Automatic Stay (the "Motion") as follows:

1. While the Friedmans do not object to the relief requested in the Motion, they do not agree with many of the statements made in the Certification of Counsel submitted in support of the Motion, and specifically reserve and preserve all rights to contest any such statements.

FLASTER/GREENBERG P.C.

Dated: March 2, 2020

By: /s/ Harry J. Giacometti
Harry J. Giacometti, Esquire